

1 Steve W. Berman (Pro Hac Vice)
 2 HAGENS BERMAN SOBOL SHAPIRO LLP
 3 1918 Eighth Avenue, Suite 3300
 4 Seattle, WA 98101
 5 Telephone: (206) 623-7292
 6 Facsimile: (206) 623-0594
 7 steve@hbsslw.com

8 Bruce L. Simon (SBN 96241)
 9 PEARSON SIMON WARSHAW & PENNY, LLP
 10 44 Montgomery Street, Suite 2450
 11 San Francisco, CA 94104
 12 Telephone: (415) 433-9000
 13 Facsimile: (415) 433-9008
 14 bsimon@pswplaw.com

15 *Plaintiffs' Interim Co-Lead Counsel*

16 *[Additional Counsel listed on*
 17 *Signature Page]*

RODGER R. COLE (CSB No. 178865)
rcole@fenwick.com
 MOLLY R. MELCHER
 (CSB No. 272950)
mmelcher@fenwick.com
 FENWICK & WEST LLP
 Silicon Valley Center
 801 California Street
 Mountain View, CA 94041
 Telephone: 650.988.8500
 Facsimile: 650.938.5200

TYLER G. NEWBY (CSB No. 205790)
tnewby@fenwick.com
 JENNIFER J. JOHNSON
 (CSB No. 252897)
jjjohnson@fenwick.com
 FENWICK & WEST LLP
 555 California Street, 12th Floor
 San Francisco, CA 94104
 Telephone: 415.875.2300
 Facsimile: 415.281.1350

Attorneys for Defendant
Carrier IQ, Inc.

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

In re Carrier IQ, Inc. Consumer Privacy
Litigation

[This Document Relates to All Cases]

Case No. 3:12-md-2330-EMC

**STIPULATION AND [PROPOSED]
 ORDER REGARDING JOINT
 DISCOVERY LETTER BRIEF**

Date: N/A
 Time: N/A
 Place: Courtroom 5, 17th Floor
 Judge: Hon. Edward M. Chen

STIPULATION

This Stipulation and [Proposed] Order is entered into by and between Plaintiffs' Interim Co-Lead Counsel and Defendants' counsel (collectively, the "Parties") as follows:

WHEREAS, on February 14, 2013, the Parties filed a Further Joint Status Report stating that the Parties anticipate filing discovery motions in the form of joint letter briefs no later than March 18, 2013 (Dkt. No. 147);

WHEREAS, on March 11, 2013, counsel for the undersigned parties met-and-conferred regarding Plaintiffs' discovery requests, Defendants' responses and objections to Plaintiffs' discovery requests, and the permissible scope of arbitration-related discovery. Counsel from the West Coast met and conferred in person in San Francisco, and counsel located in Chicago and the Washington, D.C. area participated telephonically;

WHEREAS, the Parties anticipate that they will be unable to reach agreement as to Plaintiffs' requests for arbitration-related discovery, but are continuing to meet and confer in an attempt to reach a resolution and narrow the issues in dispute;

WHEREAS, in compliance with the Court's Civil Standing Order on Discovery, the Parties anticipate filing a Joint Letter Brief seeking the Court's assistance with resolving their disputes on March 21, 2013;

WHEREAS, the Parties propose filing a single consolidated Joint Letter Brief on behalf of all Parties, rather than filing separate letter briefs concerning the discovery requests issued to each Defendant;

WHEREAS, the Parties propose that the page limit for the consolidated Joint Letter Brief be expanded from three (3) pages to no more than ten (10) pages, exclusive of the Parties' signature blocks, to accommodate the discovery disputes between Plaintiffs and each of the seven Defendants;

NOW THEREFORE, the Parties, by and through their respective counsel of record, hereby stipulate, subject to Court approval, as follows:

1. The Parties shall file one consolidated Joint Letter Brief on behalf of all Parties on March 21, 2013; and

2. The page limit for the Joint Letter Brief is expanded from three (3) to no more than ten (10) pages, exclusive of the Parties' signature blocks.

IT IS SO STIPULATED.

Dated: March 12, 2013

By: /s/ Steve W. Berman

STEVE W. BERMAN (Pro Hac Vice)
HAGENS BERMAN SOBOL SHAPIRO LLP
Robert F. Lopez (Pro Hac Vice)
Thomas E. Loeser (202724)
HAGENS BERMAN SOBOL SHAPIRO LLP
1918 Eighth Avenue, Suite 3300
Seattle, WA 98101
Telephone: (206) 623-7292
Facsimile: (206) 623-0594
steve@hbsslaw.com
robl@hbsslaw.com
toml@hbsslaw.com

Jeff D. Friedman (173886)
Shana E. Scarlett (217895)
HAGENS BERMAN SOBOL SHAPIRO LLP
715 Hearst Avenue, Suite 202
Berkeley, CA 94710
Telephone: (510) 725-3000
Facsimile: (510) 725-3001
jefff@hbsslaw.com
shanas@hbsslaw.com

By: /s/ Daniel L. Warshaw

Daniel L. Warshaw (SBN 185365)
PEARSON SIMON WARSHAW & PENNY,
LLP
15165 Ventura Blvd., Suite 400
Sherman Oaks, CA 91403
Telephone: (818) 788-8300
Facsimile: (818) 788-8104
dwarshaw@pswplaw.com

Bruce L. Simon (SBN 96241)
William J. Newsom (SBN 267643)
44 Montgomery Street, Suite 2450
PEARSON SIMON WARSHAW & PENNY,
LLP
San Francisco, CA 94104
Telephone: (415) 433-9000
Facsimile: (415) 433-9008
bsimon@pswplaw.com
wnewsom@pswplaw.com

Plaintiffs' Interim Co-Lead Counsel

By: /s/ Tyler G. Newby

Tyler G. Newby (CSB No. 205790)

1 tnewby@fenwick.com
 2 Jennifer J. Johnson (CSB No. 252897)
 3 jjjohnson@fenwick.com
 4 FENWICK & WEST LLP
 5 555 California Street, 12th Floor
 6 San Francisco, CA 94104
 7 Ph: (415) 875-2300
 8 Fax: (415) 281-1350

6 Rodger R. Cole (CSB No. 178865)
 rcole@fenwick.com
 7 Molly R. Melcher (CSB No. 272950)
 mmelcher@fenwick.com
 8 FENWICK & WEST LLP
 9 801 California Street
 10 Mountain View, CA 94041
 11 Ph: (650) 988-8500
 12 Fax: (650) 938-5200

Attorneys for Defendant Carrier IQ, Inc.

13 By: /s/ Rosemarie T. Ring

Rosemarie T. Ring (SBN 220769)
 14 Rose.Ring@mto.com
 15 Jonathan H. Blavin (SBN 230269)
 Jonathan.Blavin@mto.com
 16 Bryan H. Heckenlively (SBN 279140)
 Bryan.Heckenlively@mto.com
 17 MUNGER, TOLLES & OLSON, LLP
 18 560 Mission Street
 19 Twenty-Seventh Floor
 20 San Francisco, CA 94105-2907
 21 Phone: (415) 512-4000
 22 Fax: (415) 512-4077

20 Henry Weissmann (SBN 132418)
 Henry.Weissmann@mto.com
 21 MUNGER, TOLLES & OLSON, LLP
 22 355 South Grand Avenue,
 23 Thirty-Fifth Floor
 24 Los Angeles, CA 90071-1560
 25 Telephone: (213) 683-9100
 26 Facsimile: (213) 687-3702

Attorneys for Defendant HTC America, Inc.

1 By: /s/ Simon J. Frankel

2 Simon J. Frankel
 sfrankel@cov.com
 Mali B. Friedman
 mfriedman@cov.com
 COVINGTON & BURLING LLP
 1 Front St., 35th Floor
 San Francisco, CA 94111
 Phone: (415) 591-6000
 Fax: (415) 591-6091

6 *Attorneys for Defendant Huawei Devices USA,*
 7 *Inc.*

8 By: /s/ James Donato

9 James Donato (SBN (146140)
 jdonato@shearman.com
 SHEARMAN & STERLING LLP
 Four Embarcadero Center, Suite 3800
 San Francisco, CA 94111-5994
 Phone: (415) 616-1100
 Fax: (415) 616-1199

12 *Attorneys for Defendant LG Electronics*
 13 *MobileComm U.S.A., Inc.*

14 By: /s/ Norman K. Beck

15 Peter C. McCabe III
 pmccabe@winston.com
 Norman K. Beck
 nbeck@winston.com
 Scott T. Sakiyama
 ssakiyama@winston.com
 WINSTON & STRAWN LLP
 35 W. Wacker Drive
 Chicago, IL 60601-9703
 Phone: (312) 558-5600
 Fax: (312) 558-5700

21 Krista M. Enns (SBN 206430)
 kenns@winston.com
 WINSTON & STRAWN LLP
 101 California Street
 San Francisco, CA 94111-5894
 Telephone: (415) 591-1000
 Facsimile: (415) 591-1400

25 *Attorneys for Defendant Motorola Mobility LLC*

26 By: /s/ Wayne M. Helge

27 Wayne M. Helge
 whelge@park-law.com
 H.C. Park & Associates, PLC
 1894 Preston White Drive

Reston, VA 20191
Phone: (703) 288-5105
Fax: (703) 288-5139

Attorneys for Defendant Pantech Wireless, Inc.

By: /s/ Lance A. Etcheverry

Lance A. Etcheverry
lance.etccheverry@skadden.com
300 South Grand Avenue, Suite 3400
Los Angeles, California 90071
Phone: (213) 687-5000
Fax: (213) 687-5600

*Attorneys for Defendant Samsung
Telecommunications America, LLC*

FENWICK & WEST LLP
ATTORNEYS AT LAW
MOUNTAIN VIEW

ATTESTATION

I, Tyler G. Newby, am the ECF User whose identification and password are being used to file this **STIPULATION AND [PROPOSED] ORDER REGARDING JOINT DISCOVERY LETTER BRIEF**. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that all signatories have concurred in this filing.

Dated: March 12, 2013

/s/ Tyler G. Newby

Tyler G. Newby (CSB No. 205790)

tnewby@fenwick.com

FENWICK & WEST LLP

555 California Street, 12th Floor

San Francisco, CA 94104

Ph: (415) 875-2300

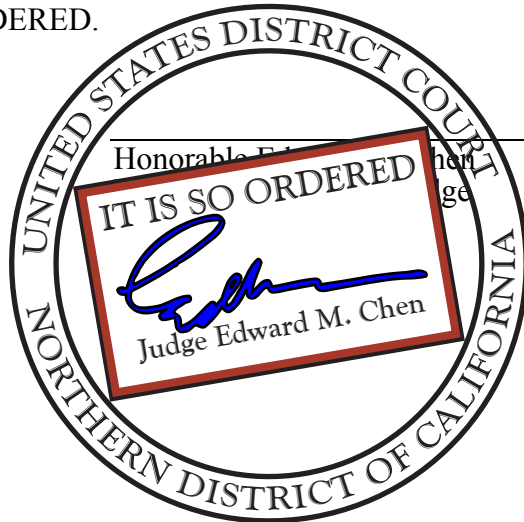
Fax: (415) 281-1350

[PROPOSED] ORDER

Pursuant to stipulation, it is SO ORDERED.

3/14/13

Dated: _____



FENWICK & WEST LLP
ATTORNEYS AT LAW
MOUNTAIN VIEW